



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 25, 2016

Connie Welch  
Authorized Representative  
Special Materials Company  
70 West 40<sup>th</sup> Street, 2<sup>nd</sup> Floor  
New York, NY 10018

Subject: Notification per PRN 98-10 – Correct ingredients statement  
Product Name: AVANCID 35  
EPA Registration Number: 74712-11  
Application Date: March 23, 2016  
Decision Number: 515341

Dear Ms. Welch:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact me at (703) 308-8735 or via email at [chao.julie@epa.gov](mailto:chao.julie@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Chao".

Julie Chao, Product Manager 33  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

# NOTIFICATION

74712-11

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

3/25/2016

## AVANCID® 35

FOR INDUSTRIAL USE ONLY

**Active Ingredient:**

Tetrakis(hydroxymethyl) phosphonium sulfate ..... 35.0%

**Other Ingredients:** ..... 65.0%

**Total:** ..... 100%

Deleted: 75

**KEEP OUT OF REACH OF CHILDREN**

### DANGER

#### FIRST AID

<b>If In Eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If On Skin Or Clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If Swallowed</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>If Inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice. If breathing is difficult, oxygen should be administered by a qualified professional.</li></ul>

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

#### HOT LINE NUMBER

**IN CASE OF EMERGENCY** endangering life or property involving this product, call 800-424-9300. Have product container or label with you when calling a poison control center or doctor or going to treatment.

#### NOTE TO PHYSICIAN

Probably mucosal damage may contraindicate the use of gastric lavage. Maintain adequate ventilation and oxygenation of the patient. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

EPA Reg. No. 74712-~~11~~

EPA Est. No. 74712-SC-001

Deleted: X

Special Materials Company  
70 West 40th Street  
New York, New York 10018

Net Contents: \_\_\_\_\_ Gal (lbs)

Lot Number: \_\_\_\_\_

Deleted: X

**DANGER**  
**PRECAUTIONARY STATEMENTS**  
Hazards to Humans and Domestic Animals  
**DANGER**

**Danger: Corrosive.** Causes irreversible eye damage. May be fatal if swallowed. Harmful if inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid breathing vapor or spray. Wear long sleeved shirt and pants or coveralls, goggles or face shield, and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum and using tobacco or using the toilet. Remove and wash contaminated clothing before use.

**User Safety Recommendations**

Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must wash hands before eating, drinking, chewing gum, or using the toilet. Users must remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

**OIL FIELD AND PETROCHEMICAL OPERATIONS**

AVANCID® 35 is effective in controlling the growth of sulfate reducing bacteria, general aerobic bacteria, and microorganisms that contribute to biofilm formation in oil field recovery, processing and distribution applications and supporting systems; such as injection water, water holding tanks, disposal well water, recirculating water handling systems, and pipelines. AVANCID® 35 has been shown to dissolve iron sulfide and sequester iron when used under these conditions, leading to improvements in pump and filter life, injectivity, oil water separation, and reduction of sheen. AVANCID® 35 is also effective for use in controlling microbial growth in fluids used for drilling and stimulation of oil and gas formations.

**Produced and Injection Water Treatment (Water Floods) [Not for use in California]**

AVANCID® 35 should be added to a produced or injection water system at a point where uniform mixing will occur.

**Initial Treatment:**

For a noticeably fouled system, add 200-750 ppm AVANCID® 35. When added to a flowing system, slug dose for 2-6 hours based on flow rates. Repeat as necessary until control is achieved.

**Subsequent Treatment:**

Once control has been achieved, add 30-210 ppm AVANCID® 35 weekly or as needed to maintain control. When added to a flowing system, slug dose for 2-6 hours based on flow rates.

**Continuous Treatment:**

AVANCID® 35 can be dosed continuously at a level of 30-143 ppm.

**Oil and Gas Transmission Pipelines and Systems**

AVANCID® 35 should be added at a point in the pipeline where uniform mixing will occur. The application should be conducted to ensure maximum distribution of product through the internal surface of the pipeline by adding an amount of biocide which eventually comes out the other end of the pipeline. Criteria for success of the treatment will be reduction in bacterial count and/or corrosion rates.

**Slug Dosing:**

Follow instructions for injection water (Water Flood) treatment.

**Continuous Dosing:**

AVANCID® 35 can be dosed continuously at a level of 30-215 ppm.

**Drilling Muds, Packer Fluids, Completion and Workover Fluids**

Add AVANCID® 35 at a point where uniform mixing will occur. Add 70-3,000 ppm of AVANCID® 35 to a freshly prepared fluid depending on severity of contamination.

**Hydraulic Fracturing [Not for use in California]**

AVANCID® 35 should be added to the frac water storage tanks or directly into the well head injection pipeline as the water is being pumped down-hole. Add 143-750 ppm of AVANCID® 35, depending on the degree of bacterial fouling in the source water.

**Gas Storage Wells and Systems [Not for use in California]**

Individual wells should be treated with AVANCID® 35 in the same manner and at the same application rates as described under Water Floods. Individual drips should be treated with a sufficient quantity of AVANCID® 35 to produce a concentration of 72-286 ppm when diluted by the water present in the drip. Repeat as needed to maintain control.

### **Well Remediation Operations Not for use in California]**

Individual production or injection wells may be bullheaded with AVANCID® 35 to control bacteria and dissolve iron sulfide deposits. Pump the product into the well as an aqueous solution containing from 28.5 to 85% AVANCID® 35 (10-20% THPS). The well should be shut in for at least 6 hours before putting it back into operation.

### **Hydrotesting**

Water used to hydrotest pipelines or vessels should contain 143-1,430 ppm AVANCID® 35, depending on water quality and length of time the equipment will remain idle.

### **Pipeline Pigging and Scraping**

Add AVANCID® 35 to a slug of water contained between the scraper and the trailing pig to produce a concentration of 0.015%-0.15% (150-1,500 ppm) AVANCID® 35 in the water at the discharge point or pig trap, depending on the length of the pipe and the severity of biofouling.

### **INDUSTRIAL AND/OR COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS (for control of bacteria, fungi, and algae)**

**Note:** For cooling water systems of equal to or greater than 4000 gallons, do not apply by open pouring of liquid to cooling water systems; a metering pump delivery system is required for this use and application method.

**Initial Slug Dose:** Add 200-750 ppm AVANCID® 35 for 2-6 hours based on total water volume. Repeat until control is obtained.

**Subsequent Treatment:** Add either intermittently 75-300 ppm AVANCID® 35 or continuously 40-140 ppm of AVANCID® 35 (14-49 ppm THPS) per day. Dirty systems must be cleaned prior to treatment.

### **HEAT TRANSFER SYSTEMS (Evaporative Condensers, Dairy Sweetwater Systems, Hydrostatic Sterilizers and Retorts, Brewery and Other Pasteurizers, and Warmers).**

Add AVANCID® 35 at the same application rates, and in the same manner as described for Recirculating Cooling Water Systems. Add AVANCID® 35 to the system at a point where uniform mixing will occur such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

### **SERVICE WATER AND AUXILIARY SYSTEMS) [Not for use in California]**

Add AVANCID® 35 at the same application rates, and in the same manner as described for Recirculating Cooling Water Systems. Add AVANCID® 35 to the system at a point where uniform mixing will occur such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

#### **AIR WASHER SYSTEMS (for control of bacteria and fungi) [Not for use in California]**

For control of bacteria and fungi. This product may be used only in air washer systems which have mist eliminating components. Pre-clean the system with detergent and allow air washer to run with fan on for two hours. Flush and check nozzles, manually cleaning as necessary. Add 75-200 ppm AVANCID® 35 at a point where uniform mixing and even distribution will occur. Repeat as needed to maintain control.

#### **INDUSTRIAL FRESH WATER SYSTEMS [Not for use in California]**

Do not use in freshwater used in the manufacture of paper and paperboard products that may contact food. AVANCID® 35 is effective in controlling algae in holding ponds and in controlling bacteria and fungi in holding and processing tanks of industrial fresh water systems supplying water to pulp and paper mills, textile mills, and other manufacturing plants. In pulp and paper mills, treatment of the fresh water with AVANCID® 35 can make an important contribution to slime control. The use of AVANCID® 35 as described will reduce the development of slime in fresh water pipes other equipment, and on the pulp and paper mill machine parts contacted by fresh water. For the control of algae in industrial fresh water systems, AVANCID® 35 should be added to provide a concentration of 3-30 ppm of product. Treatment should be based on the amount of water entering a pond or reservoir or leaving the pond or reservoir and entering the immediate processing operations. While treatment can be made continuously, regular slug-dosing treatment will provide adequate control.

#### **MACROFOULING CONTROL [Not for use in California]**

AVANCID® 35 should be added continuously to maintain a level of 20 ppm active ingredient (THPS) in the system for a period of at least 96 hours. Initial Dose: When macrofouling is present in the system, apply 57 ppm of AVANCID® 35 based on total water volume. Continue to add AVANCID® 35 as needed to maintain the 20 ppm active ingredient (THPS) level for a period of at least 96 hours.

#### **FIRE PROTECTION SYSTEMS**

AVANCID® 35 is effective at controlling microbial growth in waters and on pipe surfaces in fire protection systems. Such microbial growth when combined with other forms of corrosion can lead to accelerated corrosion rates and pitting corrosion, commonly referred to as microbiologically influenced corrosion. AVANCID® 35 also helps to remove free oxygen from the water, thus eliminating an important nutrient for bacteria and an important reactant in many corrosion reactions.

AVANCID® 35 should be added to a fire protection system using a chemical metering pump. Inject at a point, such as a riser, manifold, or makeup feed water line, where uniform mixing and even distribution will occur. Add 215-857 ppm AVANCID® 35 depending on severity of microbial contamination in the system. Repeat as needed based on the level of contamination in the system.

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**STORAGE:** Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. Keep container tightly closed when not in use. In case of a spill, flood the area with large quantities of water.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

**CONTAINER Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.